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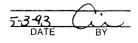
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O'Roarke

CORRES CONTROL

Reviewed for Addressee Corres, Control RFP



Ref Ltr. #

LORADO DEPARTMENT OF HEALTH

licated to protecting and improving the health and ironment of the people of Colorado

O Cherry Creek Dr. S. ver, Colorado 80222-1530 4210 E. 11th Avenue ne (303) 692-2000

April 26, 1993

Laboratory Building Denver, Colorado 80220-3716 (303) 691-4700

EG&G ROCKY FLATS PLANT CORRESPONDENCE CONTROL

Hay



Ray Ramer Governor

Patricia A. Nolan, MD, **Executive Director**

Mr. Rich Schassburger U. S. Department of Energy Rocky Flats Plant Building 116 P. O. Box 928 Golden, CO 80402

RE: DRAFT FINAL, OU 7 TECHNICAL MEMORANDUM NO. 3, SURFACE SOIL AND ASBESTOS DISPOSAL AREA CHARACTERIZATION PLAN, January, 1993

Dear Mr. Schassburger,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) and the U. S. Environmental Protection Agency (EPA) previously commented on the document referenced above in a letter to you on February 22, 1993. Subsequent discussions with DOE and its contractor, EG&G, have demonstrated a need for further clarification. The following guidance is therefore provided.

Section 3.2, which describes asbestos disposal characterization, was previously cited as being too general. The existence of asbestos waste is assumed and further investigations to determine exact amounts or locations are considered unnecessary. The Division and EPA are satisfied that the asbestos pit areas can be adequately defined by examining historical aerial photos and by considering the outline of warning signs. An appraisal of geophysical methods has concluded that none could apparently add significant reliable information to help delineate or characterize these pits.

The remaining issue of concern is potential radionuclide contamination of the asbestos waste. Historical data is insufficient to conclude whether or not radionuclide-contaminated materials were deposited in these pits. The Division and EPA therefore require that the investigation of the asbestos pits determine the presence or absence of radionuclides. Because of the potential for spreading asbestos contamination, DOE is encouraged to choose from investigative methods that are as unintrusive as possible. Please inform the agencies when this investigation is scheduled to begin.

This document was previously conditionally approved. Resolution of these comments on Section 3.2 is required for final approval. Once approved, this technical memorandum will be an addendum to the Final, Phase I RFI/RI Work Plan for OU 7.

If you have any questions concerning these comments, please contact Carl Spreng of the Division at 692-3358 or Bill Fraser of EPA at 294-1081.

Sincerely,

Gary W. Baughman Chief, Facilities Section

Hazardous Waste Control Program

Martin Hestmark, Manager

Martin Kestman2

Rocky Flats Project EPA

cc:

Daniel S. Miller, AGO
Jackie Berardini, CDH-OE
Bob Birk, DOE

Tim O'Roarke, EG&G